

Exhibit A

AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the
District of New JerseyUnited States of America
v.

KAYAN FRAZIER

Defendant(s)

Case No. 19-mj-5578 (KMW)

ORIGINAL FILED

JUL - 3 2019

WILLIAM T. WALSH, CLERK

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 2015 through April 15, 2019 in the county of Atlantic in the
 District of New Jersey, the defendant(s) violated:*Code Section**Offense Description*18 U.S.C. § 2252A(a)(2) and
18 U.S.C. § 2251(a)Receipt, distribution and production of child pornography, more fully
described in Attachment A.

This criminal complaint is based on these facts:

See Attachment B.

☒ Continued on the attached sheet.*Complainant's signature*

Daniel A. Garrabrant, Special Agent, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: 07/03/2019*Judge's signature*City and state: Camden, New Jersey

Hon. Karen M. Williams, U.S.M.J.

Printed name and title



CONTENTS APPROVED

UNITED STATES ATTORNEY

By: 

DIANA VONDRA CARRIG
Assistant U.S. Attorney

Date: July 3, 2019

ATTACHMENT A

Count 1 – Receipt of Child Pornography

From in or about March 2015 through on or about April 15, 2019, in Atlantic County, in the District of New Jersey, and elsewhere, defendant

KAYAN FRAZIER,

did knowingly receive more than three images of child pornography, as defined in Title 18, United States Code, Section 2256(8), which had been saved to his mobile telephone and flash drive, each of which images had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Section 2252A(a)(2)(A) and (b)(1).

Count 2 – Distribution of Child Pornography

During the period from on or about September 8, 2018 through on or about November 11, 2018, in Atlantic County, in the District of New Jersey, and elsewhere, defendant

KAYAN FRAZIER,

did knowingly distribute more than three images of child pornography, as defined in Title 18, United States Code, Section 2256(8), using a computer device, including a mobile telephone, each of which had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Section 2252A(a)(2)(A) and (b)(1).

Count 3 – Production of Child Pornography

From in or about March 2017 to on or about April 15, 2019 in Atlantic County, in the District of New Jersey, and elsewhere, defendant

KAYAN FRAZIER,

did knowingly employ, use, persuade, induce, entice and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct and such visual depiction was produced or transmitted using materials that have been mailed, shipped or transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Section 2251(a) and (e).

ATTACHMENT B

1. I, Daniel A. Garrabrant, am a Special Agent with Federal Bureau of Investigation (“FBI”) within the United States Department of Justice. I have personally participated in this investigation and am aware of the facts contained herein based upon my own investigation as well as information provided to me by other law enforcement officers. Since this Affidavit is submitted for the sole purpose of establishing probable cause to support the issuance of a complaint, I have not included every fact known to me concerning this investigation.

2. I am the Child Exploitation Task Force Coordinator CETF for the FBI’s Atlantic City Resident Agency (ACRA). This Task Force is comprised of investigators from the Atlantic County Prosecutor’s Office, Atlantic County Sheriff’s Office, New Jersey State Police, and the New Jersey Human Services Police. This Task Force specializes in investigations related to the sexual exploitation of children. All statements contained in this affidavit are reported in substance and in part.

OVERVIEW

3. Beginning in or about February 2019, the Atlantic County Prosecutor’s Office began an investigation into the activities of Kayan A. Frazier (hereinafter “Frazier”), pertaining to Frazier’s possession and distribution of child pornography, and suspected production of child pornography.

4. On or about April 15, 2019, law enforcement officers executed search warrants on Frazier's apartment in Somers Point, New Jersey (hereinafter "Frazier's Apartment") and on Frazier's automobile, a white 2016 Nissan Sentra (hereinafter "Frazier's Car").

5. After executing the search warrants, law enforcement officers interviewed numerous individuals including Frazier, Minor Male 1, and Minor Male 1's mother. Minor Male 1 lived part-time with his mother and part-time with Frazier at Frazier's Apartment. As explained more fully herein, during post-search interviews, Minor Male 1 identified sexually explicit images of himself recovered from Frazier's mobile telephones, and stated that Frazier had repeatedly engaged in sexually explicit conduct with Minor Male 1. Minor Male 1 also stated that Frazier had threatened to harm Minor Male 1's family members if Minor Male 1 did not comply with Frazier's sexual advances or if he told anyone about those advances. As explained more fully herein, when interviewed by law enforcement officers, Minor Male 1's mother stated she was unaware that Frazier had engaged in sexually explicit contact with Minor Male 1.

6. Law enforcement officers interviewed Frazier on the day of the April 15, 2019 search. As a result of the evidence recovered to date and Frazier's interview, the Atlantic County Prosecutor's Office charged Frazier with unlawful

possession of child pornography. Frazier has been in continuous custody since his arrest.

7. Thereafter, law enforcement officers analyzed the evidence seized from Frazier's Apartment, including electronic evidence contained in his mobile telephones. Those items contained thousands of images of child pornography, including images of Minor Male 1.

8. On or about May 23, 2019, the United States obtained federal warrants to search Frazier's Apartment and Frazier's Car for items visible in images of child pornography, items described by witnesses, items which were gifts from Frazier to Minor Male 1, and other items which were not collected because their relevance was determined only after reviewing the images and conducting interviews.

9. As described more fully herein, there is probable cause to believe that Frazier received, distributed and produced sexually explicit images.

SUMMARY OF THE INVESTIGATION

10. In February 2019, the ACRA-CETF received the National Center for Missing and Exploited Children (NCMEC)'s CyberTipline Report #44206185 from the High Technology Criminal Investigations Unit at the Atlantic County Prosecutor's Office. NCMEC is a national clearinghouse that gathers information about missing and exploited children for law enforcement officers use. NCMEC

employees frequently receive CyberTipline reports from various sources providing information about children being exploited on the Internet. After reviewing a CyberTipline Report, NCMEC disseminates the information to the Internet Crimes Against Children (ICAC) Task Force Program, which then disseminates it to the appropriate law enforcement officers' agency.

11. The CyberTipline Report #44206185 was generated based on a report made by Tumblr. Tumblr is a micro-blogging and social networking service company based in New York City.

- a. Based on the tip, law enforcement officials determined that a subject with the account or user name "ley26ley26" had uploaded images of suspected child pornography.
- b. These images were uploaded to Tumblr from September 8, 2018 through November 18, 2018, after which Tumblr suspended the "ley26ley26" Tumblr account for violating Tumblr's content policy.

12. Law enforcement officers reviewed the files from the user account "ley26ley26" and observed images of child pornography, including:

- a. An image depicting a minor black male in green shorts on his knees in front of a male who has his exposed penis in front of the child's face.
- b. An image showing a young minor black male on his knees with what appears to be a naked adolescent minor male with his exposed penis in the child's face.
- c. An image showing a young minor black male on his knees naked on a bed with an adolescent black male naked on the same bed with his mouth on the child's anus.

- d. An image showing a minor black male and an adolescent black male naked on a bed. The adolescent black male has his legs raised over his head while the minor black male is leaning forward with his face over the adolescent's genitals.

13. In addition, the subject with the account or user name "ley26ley26" posted two images of what appear to be mobile telephone screen shots of a Dropbox account. Dropbox is a digital "workspace" occasionally used by persons who trade, purchase and produce images of child pornography.

14. One of the Dropbox accounts was named "Jaden the god." The screenshots stated, "Your Dropbox is full" and depicted icon images of young black males with the text "Hmu ["hit me up"] if you wanna buy." I am aware that phrase means refers to the offering for sale of images from the Dropbox account. Tumblr identified the account associated with the upload of these files as follows:

- a. **Emil Address:** ley26ley26@gmail.com
- b. **Screen/User Name:** ley26ley26
- c. **Profile URL:** ley26ley26.tumblr.com
- d. **IP Address:** 2601:80:4200:e89f:f5f6:8f38:9560:ad3c

15. In addition to the account identifiers listed above, Tumblr reported the suspect's last logins as follows:

Sun, 18 Nov 2018 02:54:46 -0500 from 2601:80:4200:e89f:f5f6:8f38:9560:ad3c (NJ-Egg Harbor, US)
Tue, 13 Nov 2018 23:25:47 -0500 from 2601:80:4200:e89f:cc44:3b49:e957:5cc3 (NJ-Egg Harbor, US)
Sun, 23 Sep 2018 20:59:28 -0400 from 2601:80:4200:e89f:e96c:1898:a342:5133 (NJ-Egg Harbor, US)
Sun, 23 Sep 2018 02:09:50 -0400 from 2601:80:4200:e89f:e96c:1898:a342:5133 (NJ-Egg Harbor, US)
Sat, 08 Sep 2018 19:26:45 -0400 from 2601:80:4200:e89f:c821:464e:399f:ce36 (NJ-Egg Harbor, US)

16. Law enforcement officers ran the above IP address through the American Registry for Internet Numbers (ARIN). ARIN reported the IP addresses were registered to Comcast.

17. On March 14, 2019, law enforcement officers prepared and served a subpoena to Comcast for subscriber information associated with the target IP addresses. Comcast responded and provided the following information regarding the IP address: 2601:80:4200:e89f:f5f6:8f38:9560:ad3c:

- a. **Subscriber Name:** Ka'yan Frazier
- b. **SSN:** None Found
- c. **Service Address:** Frazier's address in Somers Point NJ
- d. **Billing Address:** Frazier's address in, Atlantic City NJ
- e. **Telephone #:** xxx-xxx-8017
- f. **Type of Service:** High Speed Internet Service
- g. **Account Number:** xxxxxxxx6155
- h. **Start of Service:** 6/10/2018
- i. **Account Status:** Active
- j. **IP Assignment:** Dynamically Assigned
- k. **Email User Ids:** RosemarieFrazier2017@comcast.net

18. The billing address associated with the above account was Kayan Frazier's former address in Atlantic City and the service address on the account was Frazier's then address in Somers Point.

19. In March of 2017, the Institutional Abuse Investigation Unit ("IAIU") within the Department of Children and Families for the State of New Jersey initiated an investigation concerning Frazier's employment as a full-time substitute

teacher in an elementary school in Atlantic City, New Jersey. This investigation revealed the following:

- a. Frazier allowed a young minor male student (hereinafter “Minor Male 1”) to visit Frazier at his residence and sleep in Frazier’s bed. Minor Male 1 did not disclose any sexual contact when interviewed by IAIU.
- b. Frazier has communicated by text message with a nine-year-old male student (hereinafter “Minor Male 2”), after school hours, which was a violation of the school’s policy.
- c. Frazier was interviewed during the IAIU’s investigation and denied any inappropriate conduct. Frazier admitted that he let Minor Male 1 sleep in his bed but he claimed he was a mentor for Minor Male 1 and referred to him as his son. Frazier also acknowledged he had been texting the Minor Male 2.
- d. Based upon the IAIU’s investigation, Frazier was fired from the school.

20. FRAZIER subsequently obtained employment with the Department of Child Protection and Permanence as a caseworker, in which capacity he had direct access to children.

21. Law enforcement officers subpoenaed Sprint (the telecommunications carrier for Boost Mobile) for records pertaining to telephone number xxx-xxx-8017, the telephone number affiliated with Frazier’s Comcast account, which indicated following:

- a. Name: Kayan Frazier
- b. Address: Frazier’s prior address in Atlantic City, NJ
- c. Dates of activation: March 31, 2018 to June 19, 2018.

22. Comcast became the telephone service provider for Frazier after Sprint terminated service for xxx-xxx-8017. Law enforcement officers obtained records from Comcast on or about April 4, 2019, which indicated the following:

- a. Subscriber Name: Frazier's brother
- b. Service Address: Frazier's address in Somers Point NJ
- c. Billing Address: Frazier's address in Somers Point NJ
- d. Start Service: 06/20/2018
- e. Service Status: Active
- f. IMEI: xxxxxxxxxx127008
- g. The IMEI xxxxxxxxxx127008 indicated the equipment being used was an Apple iPhone, Model 8plus.

23. On March 22, 2019, law enforcement officers submitted a subpoena to Dropbox for all subscriber information for any Dropbox accounts associated with email: ley26ley26@gmail.com.

24. On or about April 1, 2019, law enforcement officers received Dropbox, Inc. records with the following information:

- a. Name: Yelhsa Smailliw
- b. Email: ley26ley26@gmail.com
- c. User ID: xxxx3274
- d. Subscription Status: Free

25. On March 22, 2019, Atlantic County Superior Court Judge Patricia Wild reviewed and approved a Communications Data Warrant for the contents of the Google account associated with ley26ley26@gmail.com.

26. On April 5, 2019, law enforcement officers received Google's records for the Google account associated with ley26ley26@gmail.com. Other law

enforcement officers and I conducted an analysis of the records and observed in excess of 1,000 sexually explicit images and videos of children being sexually exploited/abused. Within the court ordered records, emails associated with ley26ley26@gmail.com revealed correspondence with the email address "bigboy912004@yahoo.com." On December 9, 2018, "bigboy912004@yahoo.com" sent ley26ley26@gmail.com an email with the subject title "here u go," which attached two videos of an adolescent black male engaging in sexual acts with a young black male. These videos depicting child pornography appeared to be the same videos "ley26ley26" uploaded to his Tumblr account.

27. As described above, on April 15, 2019, law enforcement officers executed warrants to search Frazier's Apartment and Frazier's Car. The Honorable Patricia Wild, Judge of the Atlantic County, New Jersey Superior Court, authorized issuance of the warrants. During execution of the warrants, Frazier and Minor Male 1 were inside Frazier's Apartment. When asked who the child was, Frazier falsely told investigators that Minor Male 1 was his son. In fact, Minor Male 1 is not Frazier's biological son.

28. During execution of the search warrants, another law enforcement officers and I interviewed Frazier. Before the interview, I advised Frazier that he

did not have to answer any questions. Frazier consented to the interview, which was recorded, and provided the following information:

- a. Frazier's telephone number was xxx-xxx-8017, he has had this number for 3 years or more, with two different service providers – Xfinity for approximately 1 year and previously either Boost Mobile or Sprint.
- b. Frazier was the sole full time occupant of Frazier's Apartment. He allowed Minor Male 1 to live with him there several days a week.
- c. Frazier had an internet account with Comcast, which is linked, to his Comcast email RosemarieFrazier2017@comcast.net. Frazier stated that Rose Marie Frazier was his mother and she passed away in 2017.
- d. Frazier acknowledged having multiple email accounts.
- e. Frazier had an Instagram account named "Kanezzy." He denied having any other Instagram accounts.
- f. Law enforcement officer showed Frazier the Instagram public account identified as "showoff.bite," which displayed a photograph dated June 24, 2014, depicting an adolescent boy next to an adult black male. Frazier identified himself as the adult and the boy as his cousin "Zion" or "Zyon." Frazier denied knowing where the picture was taken.
- g. I am aware that the Instagram account linked to "showoff.bite" was named "ley26ley26," with the profile name, "Ashley." When I asked Frazier about "ley26ley26" Instagram account, he denied that he owned that account and also denied knowing anything about an account in the name of Ashley or Ashley Williams.
- h. Frazier refused to give his password to his mobile telephones and also refused to provide the passwords to his other electronic devices, stating that it was clear that someone must have hacked

his accounts so he was not going to give law enforcement officers his passwords.

29. During the execution of the search warrant, law enforcement officials seized the following items, among others:

- i. Maroon colored bag containing two mobile telephones
- ii. Samsung Galaxy S7 mobile telephone
- iii. Apple iPad 4th Generation tablet
- iv. Dell Inspiron laptop computer
- v. Samsung Galaxy S6 mobile telephone
- vi. Black sheet
- vii. Apple iPad Mini 2 tablet
- viii. Apple iPod Touch 5th Generation
- ix. Samsung Galaxy Tab 3 tablet
- x. Kyocera mobile telephone
- xi. Four USB thumb drives
- xii. 32 GB SanDisk USB Thumb drive
- xiii. 16GB PNY thumb drive
- xiv. Six media discs
- xv. Apple iPhone 6
- xvi. Notebook containing various notes
- xvii. Comcast Xfinity cable modem/router
- xviii. Comforter and bed sheets
- xix. One tube of personal lubricant and two unused condoms
- xx. Dell Latitude 3330 laptop

30. After the interview, the Atlantic County Prosecutor's Office Assistant Prosecutor David Ruffenach determined that there was sufficient probable cause to arrest and charge Frazier for possession and distribution of child pornography. Law enforcement officers arrested, handcuffed and transported Frazier to the Somers Point Police Department for processing. While at the Somers Point Police

Department, a detective with the ACPO advised Frazier of his *Miranda* warnings and Frazier declined to be interviewed.

31. Several hours later, law enforcement officers asked Frazier if he would allow law enforcement officers back into his apartment to retrieve Minor Male 1's clothing. Frazier consented on the condition that he was present for retrieval of the clothing. While obtaining clothes for Minor Male 1 the following occurred:

- a. When taking underwear from a drawer for Minor Male 1, Frazier stated that several pairs of underwear were not Minor Male 1's. The underwear, however, was clearly too small for Frazier, yet he claimed they were his. Because law enforcement officers were retrieving Minor Male 1's clothing and personal items based on Frazier's consent, law enforcement officers had to leave various items behind, including but not limited to clothing believed to belong to Minor Male 1 at Frazier's Apartment.
- b. Frazier refused to allow the removal of a pair of red shoes that Minor Male 1 had been observed wearing on April 11, 2019. Frazier stated that that the shoes belonged to another child, but would not say who.
- c. Frazier refused to allow the removal of a hover board or any other gifts he had purchased for Minor Male 1, including a karate uniform. Frazier said he did not want anything he purchased for Minor Male 1 to leave the residence.

32. On April 15, 2019, I interviewed Minor Male 1 and recorded the interview. During the interview, Minor Male 1 provided the following information:

- a. Frazier is not his father, Minor Male 1 stayed with Frazier several days a week and slept in the same bed as Frazier.

- b. Frazier had two personal mobile telephones – an Apple and a Samsung. Minor Male 1 stated that that Frazier was very protective of his Samsung mobile phone and told Minor Male 1 that he was never allowed to touch it. Minor Male 1 stated that if Frazier was looking at “nasty stuff” it would be on his Samsung mobile telephone.
- c. Minor Male 1 revealed to me his passwords to his personal mobile telephone and also to Frazier’s iPad, which Minor Male 1 was permitted to use. Minor Male 1 did not know the passwords for Frazier’s iPhone or Samsung mobile phone.
- d. Minor Male 1 stated that he thought Frazier had something he did not want Minor Male 1 to see on Frazier’s iPod because once, when Minor Male 1 touched Frazier’s iPod, Frazier became angry and then transferred something from the iPod to Frazier’s Samsung cell phone.
- e. Frazier previously told Minor Male 1 that Frazier engaged in sexual contact with a then-minor relative, Minor Male 3.¹ Frazier told Minor Male 1 that if he wanted to do it (meaning, engage in sexual contact) with Minor Male 3 that was okay because that is what boy cousins do with each other.

33. Summary examinations of some of the devices seized during the April 15, 2019 search of Frazier’s apartment revealed the following:

- a. Frazier’s iPhone, an Apple iPhone 8 Plus – 8 Plus, called King Kai’s iPhone, MSISDN: xxx-xxx-8017, associated with email addresses Kanezzy26@gmail.com and KingKaiFraz@icloud.com.
- i. Numerous user accounts were associated with Frazier’s iPhone, including ley26ley26@gmail.com.

- 1. Frazierkayan@yahoo.com
- 2. Kanezzy26@gmail.com
- 3. Ley26ley26@gmail.com

¹ I know that Minor Male 3 is at least 8 years older than Minor Male 1, and is currently an adult. At the time Frazier victimized Minor Male 2, he was a minor.

4. Ley26ley26@gmail.com associated with “yelhsha smailliw” Dropbox account.
 5. Kanezzy26@gmail.com associated with Text now application.
 6. Frazier2@go.stockton.edu
-
- ii. Hundreds of images of child pornography.² Law enforcement officials noticed that they had previously observed several of the pornographic images and videos of the minor males on Frazier’s iPhone during prior searches conducted by the ACPO in this investigation. Specifically, ACPO officials obtained state search warrants for a Gmail account and Dropbox account affiliated with the email ley26ley26@gmail.com, which has been identified as a Gmail account used by Frazier.
 - iii. Numerous images of Minor Male 1, including pornographic images that Minor Male 1 has identified as being produced by Frazier.
 - iv. A Facebook Account for “Katalina Santos” with the user name “Kattalicious.” A review of the “chat” strings associated with Frazier’s iPhone and Facebook Messenger, revealed that “Katalina Santos” chatted with young males (possibly minors) and exchanged images and/or videos with them. From the text strings, “Katalina” attempted to get the young males to send nude images of themselves in exchange for nude images of “her.” Based on access times, frequency and content on the iPhone, law enforcement officers believe that Frazier was posing as “Katalina Santos” or “Kattalicious” as part of a baiting/catfishing scheme

² The pornographic images found on Frazier’s iPhone are from Image Fetcher Cache with the library/caches/com.google.photos directory. This would appear to indicate that these images have been stored and/or transferred to and from Frazier’s iPhone. Based upon the number of cache images of Minor Male 1 contained on Frazier’s iPhone, law enforcement officers believe that Frazier has a large collection of pornographic images of Minor Male 1 which are remotely stored on a cloud based storage system or on a concealed storage facility or device, which was not recovered during the initial searched on April 15, 2019.

in order to trick young males into sending him naked photographs of themselves

- b. Frazier's Samsung a CDMA Model: G925P, Galaxy S6 Edge. This mobile telephone did not have a SIM card but the previous number associated with the Samsung telephone was xxx-xxx-8017.
 - i. Thousands of images of child pornography. Law enforcement officials noted that they had previously observed several of the pornographic images and videos of the minor males on Frazier's Samsung during prior searches conducted by the ACPO in this investigation. Specifically, ACPO officials obtained state search warrants for a Gmail account and Dropbox account affiliated with the email ley26ley26@gmail.com, which has been identified as a Gmail account used by Frazier.
 - ii. A review of the meta data and images identified as child pornography indicate that these images were taken in, among others, New Jersey, Florida, Georgia, Nebraska, and California.
 - iii. Numerous images of Frazier, family members, friends and/or associates of Frazier were also among the images and videos on the device.
 - iv. Law enforcement officials determined that Frazier produced numerous pornographic images of Minor Male 1.
 - v. In addition, numerous file transfers of videos and/or images to the Dropbox account were associated with the ley26ley26@gmail.com account.
 - vi. Cloud Data Sources for the device included Dropbox, Facebook and Facebook Messenger. The Facebook Account name was xxxxxxxxxxx1093.
 - 1. The Facebook Account number xxxxxxxxxxx1093 is for the Facebook Profile Katalina Santos, user name

“Kattilicious” and Email address:
Frazier2@go.stockton.edu.

- vii. Numerous user accounts were associated with Frazier’s Samsung mobile telephone, including ley26ley26@gmail.com.
- c. Frazier’s iPad is an Apple iPad - iPad 4, model MD510, called KanEzzy iPad:
 - i. The iCloud account princeguess@icloud.com was associated with Frazier’s iPad. The profile image associated with this account appears to be of Frazier with an unknown Minor Male, with the user name “My Prince.”³

34. On April 24, 2019, law enforcement officers interviewed Minor Male 1 at the FBI’s Atlantic City Resident Agency during a recorded interview. During the interview, law enforcement officers showed Minor Male 1 several images obtained from Frazier’s mobile telephones and asked Minor Male 1 to provide information about the images. Minor Male 1 identified himself as the minor in the following photographs:

- a. A series of images in which a prepubescent boy is wearing red underpants down around the middle of his legs with his penis exposed:
 - i. Minor Male 1 identified himself and said that Frazier had directed Minor Male 1 to dance with his underpants down and his penis exposed.
 - ii. Minor Male 1 identified the adult foot shown in the images as belonging to Frazier, who was taking the photographs.

³ Frazier’s nickname for Minor Male 1 is “Prince Guess.”

- iii. Minor Male 1 also identified various items shown in the background of the photographs, including a blue laundry tub, Frazier's red shoe with light colored soles and Frazier's blue punching bag.⁴
 - iv. Minor Male 1 said that he believed that the above-described items were in Frazier's Apartment at the time of the April 15, 2019 searches.
- b. Several images of a prepubescent male lying in a bed with his penis and testicles displayed in various stages of erection:
- i. Minor Male 1 identified himself in the images.
 - ii. Minor Male 1 said that Frazier took the photographs.
 - iii. The red fabric that was visible in the images were Hanes underwear which Minor Male 1 still possessed and believed to be at his residence in Atlantic County.
 - iv. Minor Male 1 said that Frazier took nude images like this on a regular basis at Frazier's old residence in Atlantic City and his current apartment in Somers Point. Minor Male 1 did not know what Frazier did with the images after taking them.
- c. A series of images of a finger and/or thumb touching a prepubescent penis:
- i. Minor Male 1 identified himself as the child in the images.
 - ii. Minor Male 1 said that the finger and/or thumb belonged to Frazier who was touching and/or fondling Minor Male 1's penis.
- d. A series of images showing a prepubescent male spreading his buttocks with his hands while images were taken of the anal area:
- i. Minor Male 1 identified himself in the images.
 - ii. Minor Male 1 said that Frazier took these pictures, and that Frazier told him how to pose for the images.

⁴ I reviewed the images and observed a blue tote and an object with a tan, white and black/dark brown Chevron pattern.

- e. One image of a prepubescent male (wearing a white tank top and four plastic bracelets – one green, one yellow and two pink – on his left wrist) lying in a bed with his erect penis displayed:
 - i. Minor Male 1 identified himself as the boy in the image.
 - ii. Minor Male 1 said that he took the photograph at the direction of Frazier using Frazier's Samsung mobile telephone.
 - iii. Minor Male 1 stated that the image was taken in the bedroom of Frazier's Apartment.
 - iv. Minor Male 1 stated that that various items in the background of the photograph – including a grey and black fan⁵ and two lamps, a floor lamp and a desk lamp⁶ – were in the bedroom of Frazier's Apartment at the time of the April 15, 2019 search.

35. On May 23, 2019, law enforcement officers conducted a second search of Frazier's Somers Point Apartment pursuant to a federal court issued search warrant. During the search, law enforcement officers seized the following items, among others, which are visible in the background of several of the pornographic images of Minor Male 1:

- a. A blue tote with rope handles.
- b. A metallic floor lamp with a white glass shade.
- c. A silver desk lamp with a silver and black shade.
- d. A grey and black circular fan.
- e. A blue plastic tote.

36. During the April 24, 2019 interview, Minor Male 1 also stated that:

⁵ In the photographs, the fan appears to be circular in shape with a grey border and black plastic grate.

⁶ In the photographs, one of the lamps is a metallic-looking floor lamp, approximately 5.5 feet tall, and the other lamp is a black and silver desk lamp with a silver rod between the head of the lamp and the base.

- a. Frazier repeatedly touched and sexually abused Minor Male 1. This began on a regular basis on or about moving into Frazier's Somers Point address in June of 2018 and continued until the time of Frazier's arrest on April 15, 2019. Frazier threatened to harm Minor Male 1's family members if Minor Male 1 did not comply or told anyone about Frazier's abuse.
- b. Frazier showed Minor Male 1 pornographic images of primarily black male boys and some white male boys on Frazier's Samsung phone.
- c. Minor Male 1 described two additional incidents during which other minor males sent photographs of their penises to "Katalina:"
 - i. While in Florida with his approximately 13 year-old cousin Minor Male 4, Minor Male 4 was communicating on the Kik Application with a female using the name "Katalina." Katalina encouraged Minor Male 4 to take a picture of Minor Male 4's penis and send it to Katalina in trade for a pornographic image of herself. Minor Male 4 did so and received an image of a naked Katalina.
 - ii. For Minor Male 1's 9th birthday, Frazier had a party at Frazier's Atlantic City Apartment where Frazier lived prior to moving into Frazier's Apartment. One of Minor Male 1's friends, Minor Male 5, was communicating with a female "Katalina," who Minor Male 1 recognized as the same "Katalina" his cousin had chatted with while they were in Florida. After repeated discussion, Katalina convinced Minor Male 5 to take a pornographic picture/video of his exposed penis and send it to her, which Minor Male 5 did.
 - iii. Minor Male 1 said that he thought Katalina may not have been a real girl, but someone catfishing.

37. On April 26, 2019, law enforcement officers went to Minor Male 1's residence and recovered a pair of boys red Hanes underwear with a blue stripe

around the waistband, which appear to be the underwear depicted in the series of photographs described above in paragraph 34. Law enforcement officers saw Minor Male 1 wearing the pink bracelet from the photographs described above in paragraph 34(e).

38. The information extracted from Frazier's Samsung mobile telephone and Frazier's iPhone indicate that Frazier pretended to be a female while communicating with young males in an effort to obtain pornographic images of the young males. Several of the young men with whom Frazier has communicated have been identified as minors.

39. Based on my training and experience, the volume of child pornography images and videos on FRAZIER's multiple social media accounts, the execution of search warrants and communication data warrants, and the other evidence described above and collected during this investigation, I have probable cause to believe:

- a. FRAZIER received and distributed child pornography through his social media accounts on Tumblr, Gmail and Dropbox.
- b. FRAZIER distributed the images of child pornography reported in NCMEC's CyberTipline Report #44206185 and described in paragraph 10 above, on or about September 8, 2018, November 13, 2018, November 18, 2018 and November 23, 2018.

- c. FRAZIER was in possession of, received and distributed child pornography through his Gmail account from on or about March 13, 2015 when his Gmail account was created through his last login on or about November 21, 2018.
- d. FRAZIER was in possession and distributed child pornography through his Dropbox account from on or about December 23, 2016 and continuing through his last login to that account on or about March 15, 2019.
- e. FRAZIER produced the sexually explicit images of Minor Male 1 during the period from in or about March 2017 through on or about April 15, 2019, the period of time when Minor Male 1 lived with FRAZIER at FRAZIER's residence.
- f. FRAZIER produced the sexually explicit images of Minor Male 1 using FRAZIER's Samsung mobile telephone.
- g. FRAZIER transferred the sexually explicit images of Minor Male 1, from his Samsung mobile telephone to his Apple iPhone using a Google based storage system as noted by the Cache/com.google.photos extension.
- h. FRAZIER viewed the sexually explicit images of Minor Male 1 on both his Samsung mobile telephone and/or his Apple iPhone.

40. I am aware that all Apple iPhones are currently assembled in China. I am aware that Samsung mobile telephones are manufactured in Vietnam, China, India, Brazil, Indonesia and Korea. Therefore, the phones that FRAZIER used to produce, receive and distribute the child pornography necessarily traveled in interstate and/or foreign commerce. I am also aware that the Corporate Headquarters for the following companies are located in the following locations: Google is in Mountain View, California; Tumblr is in Manhattan, New York; Dropbox is in San Francisco, California.

41. Based upon my education, training, and experience, and my discussions with other law enforcement officers and my review of the evidence, the images described in paragraphs 12 and 34 *infra*, were shipped and transported in and affecting interstate or foreign commerce, including by computer.